

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

R. Michael Best	:	
Keith Dougherty	:	
Docson Consulting LLC (SMLLC)	:	
Keith Dougherty Investments & Consulting	:	
LLC (SMLLC)	:	
	:	
	:	
Plaintiff(s),	:	Civil Action NO: 1:14-CV-922
	:	
v.	:	
U.S. Food Inc et al	:	
	:	Frederick Motz (Judge)
	:	
	:	Filed Electronically
	:	
	:	
Defendant(s),	:	Jury Trial Demanded
	:	
	:	
	:	
	:	

Plaintiff’s Motion to Enter Default against Curtis Property Management

And now comes Keith Dougherty and R. Michael Best pro se and seek to Enter Default against Curtis Property Management for Failure to Plead or Defend in accord with Fed.R.Civ.P 55(a)

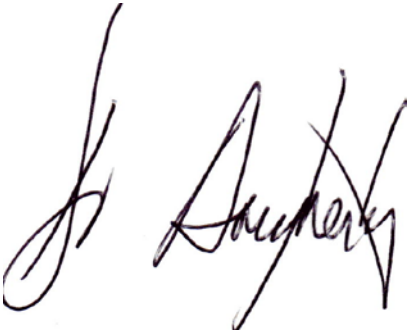
**Acting Clerk Gary L. Hollinger
United States District Court
Middle District of Pennsylvania**

1. As Defendant was properly served 5/22/2014 a “responsive

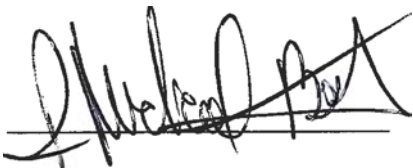
pleading was due no later than 6/12/2014.

2. Summons Return Executed was entered in the Record as of
6/4/2014 Doc 22.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "K. Dougherty", written in a cursive style.

Keith Dougherty, CFP®, CLU®, IAR, EA
Sole Member Keith Dougherty Investments & Consulting LLC
8075 Manada View Drive
Harrisburg, PA 17112-9383
866-391-7295
keithdoughertycfp@comcast.net

A handwritten signature in black ink, appearing to read "R. Michael Best", written in a cursive style.

R. Michael Best
6493 Carlisle Pike
Mechanicsburg, PA
17055 (717) 795-9350
Fax: 717-691-6636

Bestautosales1@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

R. Michael Best pro se	:	
Keith Dougherty pro se	:	
President/Secretary of CUC of MD	:	
Inc. Maryland Close Corp (S Corp)	:	
(Director) of Ken & Jim CUC Inc.	:	
Wholly owned subsidiary of CUC of	:	
MD Inc.	:	
Docson Consulting LLC (SMLLC)	:	
	:	
Plaintiff(s),	:	
	:	
	:	
v.	:	Civil Action NO: 1: 14-CV-922
	:	14-CV-480
	:	
US Foods Inc. Delaware Division	:	
Cluck U Corp	:	
JP Haddad	:	
Richard Daniels	:	
Curtis Property Management aka	:	
“the landlord”	:	
	:	
Cumberland County Sheriff’s	:	
Department; Cumberland County	:	
Prothonotary	:	
	:	
President Judge Hess Cumberland	:	
County Common Pleas	:	Frederick Motz (Judge)
Judge Bratton Dauphin County	:	
Common Pleas	:	
	:	Filed Electronically
	:	
Defendant(s),	:	
	:	Jury Trial Demanded
	:	

Order

DEFAULT

AND NOW on this_____ day of June 2014, DEFAULT is hereby entered against defendant Curtis Property Management for failure to plead or otherwise defend pursuant to Rule 55(a) Federal Rules of Civil Procedure.

**Curtis Property Management
5620 Linda Ln,
Camp Springs, MD 20748-2300
(301) 702-3200**

Gary Hollinger (Clerk)

Certification of Service

I Keith Dougherty doe hereby certify a copy of the foregoing was served by 1st class mail prepaid and by ECF where indicated;

**College Park LLC
Curtis Property Management
5620 Linda Ln,**

By ECF;

Colin S. Haviland
Legal Counsel
Supreme Court of Pennsylvania
Administrative Office of PA Courts
1515 Market Street, Suite 1414
Philadelphia, PA 19102
colin.haviland@pacourts.us
(v) 215.560.6300
(f) 215.560.5486

Joseph M. Cincotta, Esquire
(Attorney I.D. No. 31844) Stephen J. Finley, Esquire (Attorney I.D. No.
200890) GIBBONS P.C.
1700 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2769
Tel: 215-665-0400
Fax: 215-636-0366
jcincotta@gibbonslaw.com sfinley@gibbonslaw.com

Kathleen A. Stimeling, Esquire
(PHV to be filed) SCHIFF HARDIN LLP One Market
Spear Street Tower, Suite 3200
San Francisco, CA 94105
Tel: 415-901-8712
Fax: 415-901-8701
KStimeling@schiffhardin.com

Brian O. Watson, Esquire
(PHV pending)
SCHIFF HARDIN LLP
233 S. Wacker Dr. Suite 6600
Chicago, IL 60606
Tel: 312-258-5845
Fax: 312-258-5600
BWatson@schiffhardin.com

**Attorneys for Defendant
US Foods, Inc., improperly sued as
US Foods Inc. Delaware Division**

**EDWIN A.D. SCHWARTZ, ESQUIRE
Attorney ID 75902
NICOLE M. EHRHART, ESQUIRE
Attorney ID 2000538
100 Corporate Center Road, Suite 201
Camp Hill, PA 17011
(717) 651-3700
[easchwartz@mdwecg.com](mailto: easchwartz@mdwecg.com)**

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
/s/Timothy J. McMahon
Timothy J. McMahon, Esquire
I.D. No. 52918
100 Corporate Center Drive, Suite 201
Camp Hill, PA 17011
(717) 651-3505
[tjmcMahon@mdwecg.com](mailto: tjmcMahon@mdwecg.com)**

WILLIAM J. FERREN & ASSOCIATES

**Leticia J. Santiago Leticia J. Santiago, Esquire Attorney
Attorney ID# 308519
10 Sentry Parkway, Suite 301
Blue Bell, PA 19422 (215) 274-1724
(215) 274-1735- Fax
Email: [ljsantia@travelers.com](mailto: ljsantia@travelers.com)**

**Joshua D. Bonn
[jbonn@nssh.com](mailto: jbonn@nssh.com) , [klfarhat@nssh.com](mailto: klfarhat@nssh.com)**